

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**In re:**

**BK RACING, LLC,**

**Debtor.**

**Chapter 11**

**Case No. 18-30241**

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE FOR  
SERVICE OF NOTICES, PLEADINGS, AND OTHER DOCUMENTS**

PLEASE TAKE NOTICE that, in accordance with 11 U.S.C. § 1109(b), Rule 9010(b) and Rule 2002(i) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Jonathan T. Edwards and Caitlin A. Counts of Alston & Bird LLP hereby enter their appearance as counsel for the National Association for Stock Car Auto Racing, Inc. (“**NASCAR**”) and NASCAR Event Management, Inc. (“**NEM**”), parties in interest in the above-captioned chapter 11 bankruptcy case.

Pursuant to Bankruptcy Rules 1009, 2002, 3013, 3017, 4001, 6004, 9007, 9019, and 9022, and other applicable Bankruptcy Rules, NASCAR and NEM request that all notices given or required to be given in this case, and all pleadings, papers, or other documents filed, served, or required to be served in this case, be given to and served upon NASCAR’s and NEM’s counsel as follows:

Jonathan T. Edwards  
ALSTON & BIRD LLP  
One Atlantic Center  
1201 West Peachtree Street, Suite 4900  
Atlanta, GA 30309-3424  
Telephone: (404) 881-7000  
Facsimile: (404) 881-7777  
Email: jonathan.edwards@alston.com

*Application for Pro Hac Vice Forthcoming*

-and-

Caitlin A. Counts  
ALSTON & BIRD LLP  
N.C. State Bar No.: 50639  
101 S. Tryon Street, #4000  
Charlotte, NC 28280  
Telephone: (704) 444-1173  
Facsimile: (704) 444-1111  
Email: caitlin.counts@alston.com

PLEASE TAKE FURTHER NOTICE that NASCAR and NEM request that all applications, complaints, demands, motions, petitions, requests, statements, schedules, stipulations, orders, disclosure statements, plans of reorganization, and other pleadings, and any notices, which affect or seek to affect in any way any of the rights or interests of any creditor or parties in interest in this case, including, without limitation, NASCAR and NEM, with respect to the debtor, any property of the debtor, or of the debtor's estates, be given to and served upon NASCAR and NEM's counsel at the addresses set forth above.

PLEASE TAKE FURTHER NOTICE that nothing herein or otherwise, including, but without limitation, any later appearance, pleading, claim, or action, is intended or shall be deemed to be a waiver, release, or modification by NASCAR and NEM of their (a) right to have final orders in non-core matters entered after de novo review by a District Judge; (b) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (c) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) other rights, remedies, claims, actions, defenses, setoffs, or recoupments to which NASCAR and NEM are or may be entitled, all of which are hereby expressly reserved.

In compliance with the criteria for eligibility for regular attorney admission set forth in Local Rule 2090-2(a), the undersigned attorney is a member in good standing of the North Carolina

State Bar and is admitted to practice in the U.S. District Court for the Western District of North Carolina.

Respectfully submitted this the 16th day of February, 2018.

**ALSTON & BIRD LLP**

/s/ Caitlin A. Counts

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 16, 2018, the foregoing **NOTICE OF APPEARANCE AND REQUEST FOR NOTICE FOR SERVICE OF NOTICES, PLEADINGS, AND OTHER DOCUMENTS** was filed using the Court's ECF system and that a copy of the same was furnished to all ECF Participants via Notice of Electronic Filing.

I further certify that on the same date, February 16, 2018, a copy of the foregoing **NOTICE OF APPEARANCE AND REQUEST FOR NOTICE FOR SERVICE OF NOTICES, PLEADINGS, AND OTHER DOCUMENTS** was sent via First Class Mail to the following:

BK Racing, LLC  
Attn: James H. Henderson, P.C.  
1201 Harding Place  
Charlotte, NC 28204-2248

U.S. Bankruptcy Administrator Office  
402 West Trade Street, Suite 200  
Charlotte, NC 28202-1669

/s/ Caitlin A. Counts

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*Counsel for NASCAR and NEM*